

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO**

MELODY JOY CANTU AND DR. RODRIGO
CANTU,

5:20-CV-0746 JKP – HJB

Plaintiffs,

v.

DR. SANDRA GUERRA and DIGITAL
FORENSICS CORPORATION, LLC,

Defendants.

Fifth Continuance Request

Plaintiffs Dr. Rodrigo Cantu and Melody Joy Cantu, in their fifth continuance request, and Co-Defendant Dr. Sandra Guerra, through their undersigned attorneys, hereby stipulate:

1. The last filed motion in this matter is Plaintiffs' Reply in Support of Their Motion to Dismiss Dr. Sandra Guerra's Amended Counterclaims.
2. The parties are currently going through discovery. Plaintiffs and Defendant Dr. Sandra Guerra are starting mediation on August 20, 2021.
3. The ADR Report was filed on March 15, 2021 (Docket. No. 44). On August 16, 2021, expert designations are due.
4. On January 30, 2021, Plaintiff Melody Joy Cantu had a medical emergency; she was thrown off a horse. Mrs. Cantu is still dealing with pain management and recovery these past few months. She continues to be in immense pain and had an additional surgery two weeks ago.
5. Plaintiffs' counsel reached out to opposing counsel for both Co-Defendants and had a good faith conference regarding their request for a continuance with Dr. Sandra Guerra's counsel. Parties are in agreement to a 30-day continuance. After which, they will reconvene to review whether another continuance is necessary.
6. Counsel for Co- Defendant Digital Forensics Corporation, LLC, has not responded.
7. Plaintiffs and Co-Defendant Dr. Sandra Guerra are in agreement and stipulate to a thirty-day continuance of our discovery deadlines. With the new deadlines as follows:
 - September 15, 2021: Designation of Experts by Parties Asserting Claims
 - September 29, 2021: Responses to Settlement Offers from Opposing Parties
 - October 14, 2021: Last day to Amend/Supplement Pleadings, and Joinder

- November 1, 2021: Designation of Experts by Parties Resisting Claims
- December 15, 2021: Discovery Deadline
- December 29, 2021: Joint Report on Settlement Negotiations
- January 12, 2022: Last Day to File Dispositive Motions

Dated: August 16, 2021

Stipulated and respectfully submitted,

/s/ Tor Ekeland

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*Counsel for Plaintiffs Melody Joy Cantu and
Dr. Rodrigo Cantu*

Certificate of Service

I certify that on this 16th of August 2021, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/ Tor Ekeland